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June 1, 2017

VIA ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Reply Comments – BT Americas Inc.

Section 43.62 Reporting Requirements for US  
Providers of Int'l Services IB Docket No. 17-55

2016 Biennial Review of Telecommunications  
Regulations, IB Docket No. 16-131

Dear Ms. Dortch:

BT Americas Inc., a wholly-owned indirect subsidiary of BT Group plc (collectively referred to herein as "BT") respectfully submits these letter reply comments in response to the public comments filed on the need for international services reporting requirements set forth in Section 43.62 of the Commission's rules.<sup>1</sup>

Like other commenters in this proceeding, BT supports the elimination of both the annual international Traffic and Revenue Report and Circuit Capacity Report filing requirements.<sup>2</sup> Both for service providers and the Commission these reports have outlived their intended purposes in today's competitive international market.

Historically the International Traffic and Revenue Report has been used to monitor foreign settlement rates and enforce the Commission's benchmark policy. Now that foreign termination rates have remained at historically low levels, the Commission has determined that most routes are competitive and settlement rates are well below the benchmark rate established.<sup>3</sup> The Commission also noted that the data reported may actually underestimate the level of competition in the international market as the report does not include data from non-interconnected VOIP providers which often provide service for free, thereby making the data an unreliable measure of the rates at which voice services are exchanged in the international marketplace. BT agrees with other commenters that this information can be provided instead

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<sup>1</sup> Notice of Proposed Rulemaking, IB Docket No. 17-55, FCC 17-28, Mar. 23, 2017. See also, Order, IB Docket No. 17-55, May 1, 2017 (granting, on the motion of the International Bureau, a temporary waiver of the international traffic and revenue reporting requirements until 60 days after release of a Commission Order in this proceeding.)

<sup>2</sup> AT&T, Verizon, Sprint, Joint Comments of International Carriers and Infrastructure Owners, CTIA, T-Mobile, United States Telecom Association & VON Coalition

<sup>3</sup> See International Settlements Policy reform et al., IB Docket Nos. 11-80, et al., Report and Order, 27 FCC Rcd 15521 (2012) (removing the ISP from all remaining routes except the US-Cuba route).

on an as-needed and more targeted basis that will adequately address the Commission's need for this information and result in more focused and timely data than would be provided by periodic reporting.

The Circuit Capacity Report should also be eliminated because the Commission already obtains this information through its separate cable landing and satellite license processes. While the Circuit Capacity Report contains information on the ownership and control of submarine cable capacity, ownership information for each submarine cable system is also filed with the Commission with each cable landing license application, as well as with applications to transfer control or assign interests in cable systems. Details of subsequent changes to this information may be obtained by specific inquiry that would result in more timely information than through periodic reporting. In addition, while the Commission also states this report is necessary in order to provide it with a clear understanding of which operators have deployed facilities where, carriers are not required to disclose, nor do the Circuit Capacity Reports contain any information regarding the location of specific carrier facilities. Finally, the information requested is outmoded and does not easily correspond to the many business models present today for delivering communications services. It requires judgement calls to be made with respect to responses to be provided which impact the objective utility of this information being gathered. All these factors detract from the need for the information in this report.

In addition, many other commenters have stated that the burdens associated with identifying, compiling and consolidating these reports on an annual basis are excessive and arduous and in balance, because the burdens far outweigh the utility, this is a report that should be eliminated by the Commission.<sup>4</sup> BT agrees. As stated by Chairman Pai, the Commission "should ensure that reporting requirements are functions of actual need, not agency inertia, and that the benefits of this information collection outweigh the costs."<sup>5</sup>

Accordingly, BT supports the elimination of both the Traffic and Revenue Report and the Circuit Capacity Report as equally burdensome to carriers and of limited value to both the Commission and industry.

Respectfully submitted,

BT AMERICAS INC.

A handwritten signature in black ink, appearing to read 'SChacko', with a stylized, cursive script.

Sheba Chacko  
Senior Counsel and Head, Americas Regulation and  
Global Telecoms Policy

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<sup>4</sup> See, Comments of CTIA, WT docket No., 16-138, WC Docket No. 16-132, IB Docket No. 16-131, PS Docket No. 16-128 (submitted December 5, 2016) (CTIA Comments); Comments of the United States Telecom Association, IB Docket No. 16-131 (submitted December 5, 2016)

<sup>5</sup> See, Notice, Statement of Chairman Pai at 1.

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